

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JOSEPH QUINTAL, JR. derivatively on)
behalf of DENDREON CORPORATION,)
Plaintiff,)
v.) C.A. No. 14-311-LPS
SUSAN B. BAYH, BOGDAN)
DZIURZYNSKI, DENNIS M. FENTON,)
PEDRO GRANADILLO, JOHN G.)
JOHNSON, DAVID C. STUMP, DAVID L.)
URDAL, DOUGLAS G. WATSON,)
MITCHELL H. GOLD, and GERARDO)
CANET,)
Defendants,)
-and-)
DENDREON CORPORATION, a)
Delaware Corporation,)
Nominal Defendant.)

JOINT STIPULATION AND [PROPOSED] ORDER OF DISMISSAL

WHEREAS, on March 7, 2014, Plaintiff filed the Verified Shareholder Derivative Complaint (the “Complaint”) in this matter;

WHEREAS, on November 10, 2014, Dendreon Corporation (“Dendreon”), nominal defendant in the above-captioned case, filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”);

WHEREAS, on June 2, 2015, the Bankruptcy Court entered an order (the “Confirmation Order”) modifying and confirming Dendreon’s second amended plan of liquidation (the “Plan”), and on June 10, 2015, the “Effective Date” of the Plan occurred;

WHEREAS, the Plan provided, as of the Effective Date, for the extinguishment of all equity interests in Dendreon and, among other things, injunctive relief and the release of

claims and causes of action as provided in Article X of the Plan (the “Plan Injunction and Release”);

WHEREAS, the former stockholders of Dendreon received notice of the Plan, including the extinguishment of all equity interests in Dendreon and the Plan Injunction and Release, in connection with the chapter 11 bankruptcy proceeding, captioned *In re Dendreon Corp., et al.*, Chapter 11 Case No. 14-12515 (LSS);

WHEREAS, Plaintiff has determined that he lacks standing to pursue this action as a result of the extinguishment of all equity interests in Dendreon and therefore proposes to dismiss the Complaint; and

WHEREAS, the parties, by and through the undersigned counsel, hereby stipulate and agree to the dismissal of the above-captioned matter, without prejudice; it is

ORDERED, ADJUDGED and DECREED that:

1. This Court has jurisdiction over the subject matter of this action and over the parties. Venue is proper in this district.

2. All claims, counterclaims and defenses brought or raised by any party in this action are dismissed, without prejudice.

3. Each party shall bear its own costs and attorney fees for this action.

4. This Court retains jurisdiction over the subject matter of this action and the parties hereto for the purpose of any proceedings to enforce this Joint Stipulation and Order of Dismissal.

FARNAN, LLP

/s/ Brian E. Farnan

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*Attorney for Joseph Quintal, Jr.
derivatively on behalf of Dendreon
Corporation*

DATED: July 1, 2015

IT IS SO ORDERED this ____ day of July, 2015.

United States District Court Judge